



# FRIENDS OF THE CLEARWATER

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NEPA Task Force  
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NEPA Task Force,

Enclosed are comments of Friends of the Clearwater (FOC) regarding the proposal to change to the National Environmental Policy Act (NEPA).

FOC has commented on hundreds of NEPA documents over the past 15 years. It is very discouraging that the Bush Administration wants to weaken NEPA when it needs strengthening.

The FOC is against any changes that would weaken or increase the flexibility for NEPA. Administrative actions try to subvert NEPA at every turn, including taking the President's Council on Environmental Quality (CEQ) and capturing it for those who want to destroy the environment and develop every inch of public lands, NEPA is already crippled. We need a stronger NEPA and not a weaker one. This can be done in the following ways:

1) Require a specific cumulative impact analysis, assessment, and evaluation section in each Environmental Impact Statement (EIS), Environmental Assessment (EA), Categorical Exclusion (CE), and Finding of No Significant Impact (FONSI). Currently agencies either do not include cumulative impacts or say they do but provide no quantitative information. Require both quantification and qualification of all proposals for cumulative impacts. Spell out the cumulative impacts so they include all past, present, and future foreseeable actions, no matter what the action was or who did the action in the project and surrounding areas.

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law, they get those lawsuits. The number of lawsuits is not nearly as large as it could be because citizens cannot afford to go to court everything a federal agency violates NEPA. Stop lawless agencies!!!

9) Require that agency NEPA implementing regulations mirror CEQ regulations and do not re-interpret what NEPA and CEQ require.

10) Restore Section 1502.22 so the requirement that agencies are responsible for developing important information, if it can be developed in a reasonable timeframe. This worst case scenario analysis was weakened many years ago and needs to be reinstated and strengthened.

11) Require that projects cannot be segmented, ever. Stop segmenting as allowed in Section 1502.4.

12) By emasculating NEPA the Bush Administration will take away one of the most citizen friendly involvement laws in existence. There is very little opportunity for most citizens to get involved in public decision-making because there are few laws at the local and state level which mandate citizen participation and involvement. NEPA allows a community to ask questions and hold officials accountable. Anything which reduces or lessens citizen participation under NEPA will weaken our democratic form of government. When a developer, bureaucrat, or politician gets too greedy or arrogant, the power of NEPA can slap them down and require them to tell the truth. In this way NEPA offers citizens the opportunity to force these negative forces "to do the right thing." Without NEPA citizens will only be able to tell their employees (public servants and elected officials) not to do something bad, instead of actively working to get something good accomplished.

13) Do not exempt fire fighting and fuel reduction projects, defense projects, mining projects, oil/gas projects, and other projects from NEPA. We need a more inclusive use of NEPA and not a less inclusive use. Fire fighting and fuel reduction projects need to be planned carefully to ensure they do not harm the very environment they purport to protect. Bulldozing fire lines, clear-cut logging, destruction/damage to streamside zones, are all products of fire fighting and fuel reduction projects. Defense projects can damage the environment as massively as projects by other agencies. As prepared as our troops have shown themselves to be, it is a sham for the Defense Department to pretend that it is being held hostage by NEPA.

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